

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

ePLUS Inc.,)	
)	
Plaintiff,)	Civil Action No. 3:09-CV-620 (REP)
)	
v.)	
)	
LAWSON SOFTWARE, INC.,)	
)	
)	
Defendant.)	

**DECLARATION OF DAVID M. YOUNG, ESQ., IN SUPPORT OF PLAINTIFF ePLUS,
INC.'S SUPPLEMENTAL BRIEF REGARDING "MEANS FOR BUILDING A
REQUISITION" IN FURTHER SUPPORT OF MOTION TO STRIKE PORTIONS OF
DEFENDANT'S EXPERT REPORT AND EXCLUDE FROM TRIAL ALLEGED PRIOR
ART AND INVALIDITY ARGUMENTS NOT DISCLOSED IN DEFENDANT'S
COURT-ORDERED INVALIDITY CONTENTIONS**

Henry I. Willett, III (VSB #44655)
Craig T. Merritt (VSB# 20281)
CHRISTIAN & BARTON, L.L.P.
909 East Main Street, Suite 1200
Richmond, VA 23219
Telephone: (804) 697-4100
Facsimile: (804) 697-4112
hwillett@cblaw.com
cmerritt@cblaw.com

Counsel for Plaintiff, ePlus Inc.

Jennifer A. Albert (*admitted pro hac vice*)
Scott L. Robertson (*admitted pro hac vice*)
David M. Young (VSB #35997)
GOODWIN PROCTER LLP
901 New York Avenue, NW
Washington, DC 20001
(202) 346-4000

Michael G. Strapp (*admitted pro hac vice*)
James D. Clements (*admitted pro hac vice*)
GOODWIN PROCTER LLP
Exchange Place
53 State Street
Boston, MA 02109-2881
(617) 570-1000

I, David M. Young, declare as follows:

1. I am an attorney at Goodwin Procter LLP, counsel for Plaintiff *ePlus Inc.* in this action. I submit this declaration in support of Plaintiff *ePlus Inc.*'s Supplemental Brief in further support of its Motion to Strike Portions of Defendant's Expert Report and Exclude from Trial Alleged Prior Art and Invalidity Arguments Not Disclosed in Defendant's Court-Ordered Invalidity Contentions.

2. I have personal knowledge of the facts stated herein and, if called as a witness, could and would testify competently hereto.

3. Attached hereto as Exhibit A is a true and accurate copy of excerpts from the transcript of the *Markman* hearing before this Court of January 22, 2010.

4. Attached hereto as Exhibit B is a true and accurate copy of excerpts from Defendant Lawson Software, Inc.'s Initial Statement of Invalidity Defenses dated December 8, 2009.

5. Attached hereto as Exhibit C is a true and accurate copy of excerpts from Defendant Lawson Software, Inc.'s Supplemental Initial Statement of Invalidity Defenses dated December 23, 2010.

6. Attached hereto as Exhibit D is a true and accurate copy of correspondence from counsel for *ePlus* to counsel for Lawson Software, Inc. dated April 14, 2010.

I declare under penalty of perjury that the foregoing is true and correct. Executed at Washington, D.C., this 4th day of June, 2010.

_____/s/_____
David M. Young
Virginia State Bar. No. 35997
Counsel for Plaintiff ePlus, Inc.
GOODWIN PROCTER, LLP
901 New York Avenue, N.W.
Washington, DC 20001
Telephone: (202) 346-4257
Facsimile: (202) 346-4444
dyoung@goodwinprocter.com

CERTIFICATE OF SERVICE

I hereby certify that on the 4th of June, 2010, the foregoing

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was electronically filed with the Clerk of the Court using the CM/EFC system, which will then send a notification of such filing (NEF) to the following. Copies of the foregoing were also transmitted *via electronic mail* to the following:

Daniel W. McDonald, *pro hac vice*
William D. Schultz, *pro hac vice*
Rachel C. Hughey, *pro hac vice*
Joshua P. Graham, *pro hac vice*
Andrew Lagatta, *pro hac vice*
Merchant & Gould P.C.
3200 IDS Center
80 South 8th Street
Minneapolis, MN 55402-2215
Lawsonservice@merchantgould.com

Robert A. Angle (VSB# 37691)
Dabney J. Carr, IV (VSB #28679)
Troutman Sanders LLP
P.O. Box 1122
Richmond, VA 23218-1122
Telephone: (804) 697-1238
Facsimile: (804) 698-5119
robert.angle@troutmansanders.com
dabney.carr@troutmansanders.com

Counsel for Defendant Lawson Software, Inc.

/s/ Henry I. Willett, III
Henry I. Willett, III (VSB #44655)
Counsel for Plaintiff ePlus, Inc.
CHRISTIAN & BARTON, LLP
909 East Main Street, Suite 1200
Richmond, Virginia 23219-3095
Telephone: (804) 697-4100
Facsimile: (804) 697-4112
hwillett@cblaw.com